

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Glen H. Green	:	Case No. 19-20959-GLT
Esther L. Green	:	
Debtor(s)	:	Chapter 13
	:	
The Money Source, Inc.	:	
	:	
Movant(s)	:	Related to Document 136
	:	
vs.	:	Hearing Date: 2/8/23 at 10:00 a.m.
	:	
Glen H. Green	:	
Esther L. Green	:	
And Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AS TO PROPERTY LOCATED AT 923 NEWELL ROAD, FAYETTE CITY, PA 15438

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. The Money Source, Inc. requests relief from stay with regard to property located at 923 Newell Road, Fayette City, PA 15438.
2. Debtor's Schedules reflect that the fair market value of the property is \$225,000, and Movant does not dispute the valuation.
3. Debtor has claimed exemptions of \$47,350 under 11 U.S.C. § 522(d)(1) and \$1,847 under 11 U.S.C. § 522(d)(5).
4. Movant is the sole lienholder against the property with a claim in the amount of \$104,437.37.
5. On January 9, 2023, Debtors remitted a payment to Trustee in the amount of \$4,300.
6. As of the date of this filing, Debtors' arrears total \$5,585.
7. Debtor appears to have a substantial equity cushion in the property in the

amount of \$71,365.63, which should be preserved for the benefit of the estate.

8. The Court's order entered December 23, 2021 approving the sale of Debtors' property at 927 Newell Road conditioned approval on the outcome of Debtors' Chapter 13 case providing a 100% distribution to general unsecured creditors, and provided that the case may be converted to achieve that result in the event of a future plan default (Doc. 114, Paragraph (5)).

WHEREFORE, the Trustee respectfully requests that this motion be denied, or in the alternative, that the case be converted to Chapter 7.

9. Nationwide Community Revitalization, LLC, requests relief from stay with regard to property located at 11017 Azalea Drive, Pittsburgh, PA, 15235.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: January 13, 2023

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
jwarmbrodt@chapter13trusteewdpa.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Glen H. Green	:	Case No. 19-20959-GLT
Esther L. Green	:	
Debtor(s)	:	Chapter 13
	:	
The Money Source, Inc.	:	
	:	
Movant(s)	:	Related to Document 136
	:	
vs.	:	Hearing Date: 2/8/23 at 10:00 a.m.
	:	
Glen H. Green	:	
Esther L. Green	:	
And Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on the 13th of January 2023, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Marta E. Villacorta, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Glen and Esther Green
923 Newell Road
Fayette City, PA 15438

Daniel R. White, Esquire
Zebley Mehalov & White
POB 2123
Uniontown, PA 15401

Brian C. Nicholas, Esquire
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 500
Philadelphia, PA 19106

/s/Rosa M. Richard
Office of Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
cmecf@chapter13trusteewdpa.com